

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

LEHMAN BROTHERS HOLDINGS INC., AS
DEBTOR AND DEBTOR-IN-POSSESSION IN
ITS CHAPTER 11 CASE IN THE UNITED
STATES BANKRUPTCY COURT FOR THE
SOUTHERN DISTRICT OF NEW YORK, CASE
NO. 08-13555 (JMP),

Plaintiff,

-against-

BETHANY HOLDINGS GROUP, LLC, THE
TERRY & ROSE KNUTSON 2000 FAMILY
TRUST, and TERRY KNUTSON,

Defendants.

Case No. 10 Civ. 4373 (SHS)

MOTION TO ADMIT COUNSEL
PRO HAC VICE

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Courts for
the Southern and Eastern Districts of New York, I, Kyle C. Bisceglie, a member in good standing
of the bar of this Court, hereby move for an Order allowing the admission pro hac vice of:

Applicant's Name: Lawrence C. Ecoff, Esq.
Firm Name: Ecoff, Law & Salomons, LLP
Address: 280 South Beverly Drive, Suite 504
City/State/Zip: Beverly Hills, California 90212
Phone Number: (310) 887-1850
Fax Number: (310) 887-1855

Lawrence C. Ecoff, Esq. is a member in good standing of the Bar of the State of California.

There are no pending disciplinary proceedings against Lawrence C. Ecoff, Esq. in any State or
Federal court.

Dated: New York, NY
July 28, 2009

OLSHAN GRUNDMAN FROME
ROSENZWEIG & WOLOSKY LLP

By: 

Kyle C. Bisceglie (KB 6052)
*Attorneys for Defendants Terry Knutson
and Terry and Rose Knutson 2000
Family Trust*
Park Avenue Tower
65 East 55th Street
New York, New York 10022
(212) 451-2300

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AFFIDAVIT OF KYLE C. BISCEGLIE
IN SUPPORT OF MOTION FOR
ADMISSION PRO HAC VICE

State of New York)

) ss:

County of New York)

Kyle C. Bisceglie, being duly sworn, hereby deposes and says as follows:

1. I am a partner at Olshan Grundman Frome Rosenzweig & Wolosky LLP, counsel for Defendants Terry Knutson and Terry and Rose Knutson 2000 ("Defendants") in the above-captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of Defendants' motion to admit Lawrence C. Ecoff, Esq. as counsel pro hac vice to represent Defendants in this matter.
2. I am a member in good standing of the bars of the States of New York and New Jersey, and was admitted to practice law in 1993. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.
3. I have known Lawrence C. Ecoff, Esq. since 2009.
4. Lawrence C. Ecoff, Esq. is a member of Ecoff, Law & Salomons, LLP in Los Angeles, California.
5. I have found Lawrence C. Ecoff, Esq. to be a skilled attorney and a person of integrity. He is experienced in Federal practice and is familiar with the Federal Rules of Procedure.

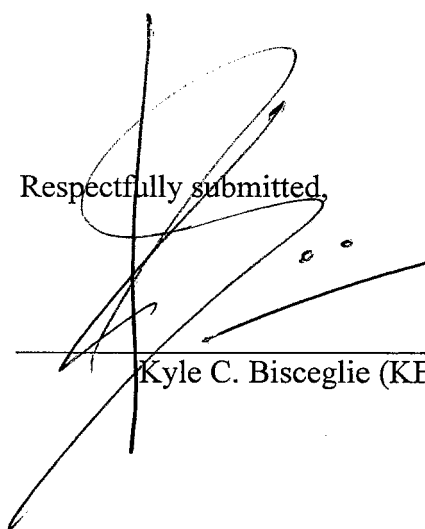
6. Accordingly, I am pleased to move for the admission of Lawrence C. Ecoff, Esq. pro hac vice.
7. I respectfully submit a proposed order granting the admission of Lawrence C. Ecoff, Esq. pro hac vice, which is attached hereto as Exhibit A.

WHEREFORE it is respectfully requested that the motion to admit Lawrence C. Ecoff, Esq. pro hac vice, in the above captioned matter, be granted.

Dated: New York, NY
July 28, 2010

Notarized:

Respectfully submitted,



Kyle C. Bisceglie (KB 6052)

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ORDER FOR ADMISSION PRO
HAC VICE ON WRITTEN
NOTICE

Upon the motion of Kyle C. Bisceglie, attorney for Defendant Terry Knutson, and said
sponsor attorney's affidavit in support;

IT IS HEREBY ORDERED that

Applicant's Name: Lawrence C. Ecoff, Esq.
Firm Name: Ecoff, Law & Salomons, LLP
Address: 280 South Beverly Drive, Suite 504
City/State/Zip: Beverly Hills, California 90212
Telephone/Fax: (310) 887-1850/(310) 887-1855
Email Address: ecoff@ecofflaw.com

is admitted to practice pro hac vice as counsel for Defendants Terry Knutson and Terry and Rose
Knutson 2000 Family Trust in the above captioned case in the United States District Court for
the Southern District of New York. All attorneys appearing before this Court are subject to the
Local Rules of this Court, including the Rules governing discipline of attorneys. Counsel shall

immediately apply for an ECF password at nysd.uscourts.gov. Counsel shall forward the pro hac vice fee to the Clerk of Court.

Dated:

United States District/Magistrate Judge



THE STATE BAR OF CALIFORNIA

MEMBER SERVICES CENTER

180 HOWARD STREET, SAN FRANCISCO, CALIFORNIA 94105-1617

TELEPHONE: 888-800-3400

CERTIFICATE OF STANDING

July 21, 2010

TO WHOM IT MAY CONCERN:

This is to certify that according to the records of the State Bar, LAWRENCE CRAIG ECOFF, #143814 was admitted to the practice of law in this state by the Supreme Court of California on December 11, 1989; and has been since that date, and is at date hereof, an ACTIVE member of the State Bar of California; and that no recommendation for discipline for professional or other misconduct has ever been made by the Board of Governors or a Disciplinary Board to the Supreme Court of the State of California.

THE STATE BAR OF CALIFORNIA

A handwritten signature in black ink, appearing to read "Kath Lambert", is written over a horizontal line.

Kath Lambert
Custodian of Membership Records

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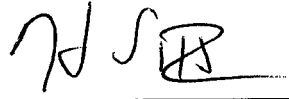
CERTIFICATE OF SERVICE

I, Howard J. Smith, am not a party to the above-entitled action and am over the age of 18 years, and hereby certify under penalty of perjury that on July 28, 2010, I caused to be served true and correct copies of the Motion to Admit Counsel Pro Hac Vice, Affidavit of Kyle C. Bisceglie in Support of Motion to Admit Counsel Pro Hac Vice and the proposed Order for Admission Pro Hac Vice on Written Motion upon:

Dechert LLP
Joseph F. Donley, Esq.
David P. Staubitz
1095 Avenue of the Americas
New York, NY 10036-6797

by depositing true copies thereof, enclosed in a postpaid, properly addressed wrapper, in an official depository under the exclusive care and custody of the United States Postal Service within New York State at the address designated above for said purpose.

Date: New York, New York
July 28, 2010

A handwritten signature in black ink, appearing to read 'HJS' followed by a stylized flourish.

Howard J. Smith

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